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6 **UNITED STATES BANKRUPTCY COURT**
7 **EASTERN DISTRICT OF WASHINGTON**

8 In re:

9 GIGA WATT, Inc., a Washington
10 corporation,

Debtor.

Case No. 18-03197 FPC 7

Chapter 7

The Honorable Frederick P. Corbit

11 **DECLARATION OF PAMELA M.**
12 **EGAN IN SUPPORT OF TRUSTEE'S**
13 **MOTION FOR SANCTIONS**
14 **AGAINST JUN DAM FOR**
15 **VIOLATING THE AUTOMATIC**
16 **STAY AND VEXATIOUS**
17 **LITIGATION**

Hearing Information

Date: February 25, 2025

Time: 10:30 a.m.

Location: Zoomgov.com

Meeting ID: 1606922376

19 I, Pamela M. Egan, pursuant to 28 U.S.C. § 1746, hereby declare as
20 follows:

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22
23 **DECLARATION OF PAMELA M. EGAN**
24 **IN SUPPORT OF TRUSTEE'S MOTION**
FOR SANCTIONS -- 1

1 1. I am over 18 years of age, of sound mind, and other competent to
2 make this Declaration.

3 2. I submit this declaration in support of the *Trustee's Motion for*
4 *Sanctions Against Jun Dam for Violating the Automatic Stay and Vexatious*
5 *Litigation* (the "Motion"), filed herewith. Unless otherwise defined herein,
6 capitalized terms used in this Declaration have the meaning ascribed to them in
the Motions.

7 3. All facts set forth in this Declaration are based upon my personal
8 knowledge.

9 4. On January 9, 2025 at 3:30 a.m., I received an email from Jun Dam
10 stating, "I am writing to inform you that, as referenced in my objection to the fee
11 application, I have filed a lawsuit, **Case No. 2:24-cv-00417**, against you, Mark
12 Waldron, Potomac Law Group PLLC, and the Giga Watt Bankruptcy Estate."
(Emphasis in original).

13 5. A true and correct copy of the Complaint (without exhibits) is
14 attached to the Motion as Exhibit A. It was filed almost a month earlier on
15 December 13, 2025.

16 6. On January 15, 2025, I notified Mr. Dam by email that the Complaint
17 violates 11 U.S.C. § 362(a)(3) by trying to recover property from the estate and
18 that he has an affirmative duty under In re Dyer, 322 F.3d 1178, 1192 (9th Cir.
19 2003), to remedy the violation by dismissing the complaint. In the same
20 correspondence, I notified him that the Complaint also violates the Barton
doctrine.

21 7. On January 16, 2025, I sent to Jun Dam by email a copy of the
22 *Trustee's and Counsel's Motions to Dismiss Complaint for (i) Lack of Subject*

23 DECLARATION OF PAMELA M. EGAN
24 IN SUPPORT OF TRUSTEE'S MOTION
FOR SANCTIONS -- 2

1 *Matter Jurisdiction, (ii) Lack of Personal Jurisdiction Over the “Giga Watt*
2 *Bankruptcy Estate” and (iii) Failure to State a Claim Against the “Giga Watt*
3 *Bankruptcy Estate,” (“Motion to Dismiss”)* filed in the District Court. In this
4 email, I reminded him of his affirmative duty to remedy the stay violation and I
5 asked him again to dismiss the Complaint.

6 8. A true and correct copy of the Motion to Dismiss is attached to the
7 Motion as Exhibit B.

8 9. On January 17, 2025, I made my last request to dismiss the
9 Complaint.

10 10. As of the date of this filing, Dam has neither responded nor dismissed
11 the Complaint.

12 11. As of 11:30 a.m., January 20, 2025, I have spent the following time
13 on the Motion to Dismiss and the Motion:

Activity	Hours	Amount
Motion to Dismiss	33.4	\$13,360
Motion for Sanctions	19.5	\$7,800
TOTAL	52.9	\$21,160

16
17 I declare under penalty of perjury that the foregoing is true and correct.

18 Executed this 21st day of January 2025.

19 /s/ Pamela M. Egan

20 _____
Pamela M. Egan

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23 DECLARATION OF PAMELA M. EGAN
24 IN SUPPORT OF TRUSTEE’S MOTION
25 FOR SANCTIONS -- 3